

EXHIBIT 138

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

I, Juan Salgado, hereby declare and affirm:

1. I am Chancellor for the City Colleges of Chicago (CCC), having been appointed by the Board of Trustees on April 6, 2017 and having commenced my tenure as Chancellor on May 1, 2017.
2. I am over the age of 18 and competent to testify.
3. I have either personal knowledge of the matters set forth below or, with respect to those matters for which I do not have personal knowledge, I have reviewed information gathered from CCC records by others within the organization.
4. Pursuant to state law, CCC is an "open enrollment" institution and accepts all students qualified to complete any one of its programs (110 ILCS 805/3-17).
5. CCC serves approximately 90,000 students from every neighborhood in the City of Chicago, including some students who currently participate in or are eligible for DACA.
6. CCC operates under the principle that a diverse student population benefits all students because students from different backgrounds and nationalities bring a unique perspective to the classroom, which enriches the learning experience of their classmates.
7. CCC welcomes students from all backgrounds and does not require proof of citizenship as a requirement to register for study. Applications submitted by potential students with DACA status are reviewed in the same manner as all other applications.
8. CCC currently offers the Star Scholarship program to all students regardless of immigration status, including those who are participants in the DACA program. The Star Scholarship allows students who graduate from Chicago public high schools with a 3.0 grade point average and test nearly college-ready to attend college tuition-free.

9. I have read the Memorandum on Rescission of Deferred Action for Childhood Arrivals (DACA).

10. Based on my experience and the shared experience of those CCC employees in the Student Affairs Office, the rescission of DACA could impact hundreds of CCC students who would be in danger of being prevented from continuing and completing their studies at CCC as the result of potential enforcement actions by the federal government. Furthermore, based on my experience, certain students may choose to leave CCC because they can no longer afford to attend classes without work authorization that was previously provided through DACA.

11. Such actions would be damaging to those affected students, as well as their classmates who would be deprived of the classroom contributions and perspectives from those students who may not be able to continue their education at CCC.

I declare under penalty of perjury under the laws of the State of Illinois that the foregoing is true and complete to the best of my knowledge.

Executed this 27th day of September, 2017



Juan Salgado
Chancellor